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IMP Gas Meeting in Columbus, Ohio

April 19 & 20, 2000

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Purpose

This meeting is one of a series of meetings between OPS and State regulators and the gas pipeline industry on how best to add protection to pipeline segments in high consequence areas (HCAs). The intended outcome of these meetings is a *technical basis document* developed by industry and docketed in support of a rulemaking.

Participants

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Key Meeting Observations

1. *Opening Remarks*

Stacey Gerard of OPS stated we are here to explore concepts on the additional protection needed for gas pipelines in high population regions. She stated the hope that the industry will note areas in which it can be helpful in developing these extra protections. There is a heightened emphasis on communication with the community, and the Administration believes that communities have a right to know more about pipeline safety. Defining the nature, form, and audience of the information to be provided to the communities is the job of OPS. The current intent is to provide needed information to the set of public officials who have responsibility for protecting people near the pipeline. Information to a broader set of the public is also needed, and the White House seeks information on the docket regarding this aspect of communication.

Gerard indicated that OPS intends to address the integrity issue on a “worst to first” basis, that is, establish integrity baselines for the highest risk segments of pipeline first, then proceed with the lower risk segments.

Concern was expressed about the disruptive effect of individual states being able to set standards more stringent than the federal standards. Gerard indicated that there is a meeting with the states during the week of April 24 to discuss how to increase their involvement in the IMP process. She emphasized it is in everyone’s best interest to fully support the IMP NPRM effort since this effort represents the future of pipeline safety regulation.

Gerard then said that she would like the industry to acknowledge the concept of establishing a baseline or benchmark thru testing on a time frame that incorporates factors influencing risk in high consequence areas. OPS wants to be in a position to work with each operator to establish a baselining program that is best for their systems and for public safety.

Discussion of the liquid NPRM included notice that the liquid industry is preparing an industry standard on integrity management in high consequence areas. This standard has participation from the broadest set of knowledgeable interest groups. The liquid rule is also “map-based” in that it defines high population regions based on census data, and allows display of the regions on maps including the pipelines.

In response to industry questions on what information is acceptable to describe “baseline integrity”, Gerard stated a willingness to discuss how the baseline should be established and on what time frame. She pointed out that the descriptive phrase currently being used for the gas IMP is “integrity assessment” rather than “direct integrity testing”. Gerard then presented slides on the liquid industry NPRM.

In response to these slides, the industry commented that the approach to the NPRM seems to provide a strong incentive to companies to pursue the “lower branch” (i.e., the

performance-based path) rather than the upper prescriptive path. Further, it is not yet clear how definitive a company needs to be in developing a program or a decision process to be allowed to pursue the lower (performance-based) path. Gerard indicated that the rule will be about “having a program”.

2. *Gas Industry Perspective*

The gas industry representatives presented their perspective on the basic principles under which they are proceeding and the premises underlying these principles. The industry expressed its belief that shared acceptance of these premises and principles provide the basis for continued meetings and discussions.

Principles for Gas Pipeline IMP

1. Time for baselining should be affected by factors other than timing of the most recent in-line inspection (e.g., operating stress, age of pipe, other routinely conducted inspection techniques).
2. Pigging technologies have been solid from the mid 80's forward for acceptable detection of corrosion.
3. Material defects are eliminated from consideration if hydro testing is carried out at a “high enough” pressure (i.e., these defects do not grow in service).
4. “Low stress” pipes are not threats; they are very unlikely to rupture, although they may leak.
5. Retest interval should be based on proven engineering and science.
6. Alternatives to pigging and hydro testing already exist.
 - Each alternative has limits,
 - Must recognize the state of technology and address real risks,
 - Must use the entire tool kit in establishing and maintaining an assurance of integrity,
 - Must make provision for technology enhancements.

Premises on Differences Between Oil and Gas Pipelines

1. Differences in the Codes lead to a difference in the current assurance of baseline integrity.
2. Product differences lead to differences in the probability (e.g., impact of cyclic fatigue) of rupture.
3. Environmental effects are different.
4. There are many ways to provide assurance of integrity (i.e., regulatory compliance, additional integrity practices).
5. Multiple (redundant) techniques provide increased assurance of integrity.
6. Need to minimize cost impact by doing only things of real benefit to assuring integrity.
7. Public awareness of the current level of safety needs to be improved.
8. Should pursue a gas industry Integrity Standard.

3. ***Discussion Resumed Following Day***

Resumed discussion of the Principles laid out the previous day.

4. ***Other Issues***

- OPS may create a sub-group to address the issue of “low pressure” piping;
- Effective use of the integrity tool kit;
- Validity of old pig runs;
- Issue of denting should be handled through integration of integrity information, and use of the complete tool kit in integrity management;
- The “bubble approach” to defining the high population regions;
- OPS requested a study of how much of the current pipeline system is likely to be viewed as in “high consequence areas”, and how much of that pipe is likely to be covered by “inferred assessment”. The industry committed to prepare data on the percentage of lines that are currently piggable, how much has been pigged, and what fraction is likely to be covered by “inferred assessment”.

5. ***Meeting Adjourned***

The next meeting was planned to be in Washington, DC around June 14 (in conjunction with the INGAA Summit).